OPTIONAL FORM 99 (7-90)

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To Peter GREVATT | From Kevin Mayer

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Mr. Michael Shapiro
United States Environmental Protection Agency
Office of Solid Waste
410 M Street SW, MC 5101
Washington DC 20460

November 16, 1997

RE: Perchlorate Contamination of Ground Waters and Surface Waters in the United States; Department of Defense Response

Dear Mr. Shapiro,

We are writing to you today with concerns regarding the perchlorate-contamination in the Colorado River and numerous groundwater basins in California. As you know, this is a very serious matter, and many Californians have been exposed to this chemical without their knowledge. Percholorate contamination has been found to be a very pervasive environmental problem, and a cost-effective remediation method for perchlorate-contaminated water has yet to be identified.

It has come to my attention that the Department of Defense is undertaking a series of percholorate studies designed to inform the process of establishing a MCL for perchlorate. These studies have not been put out for public review, and the peer review process the studies are undergoing, is not accessible to the public. Those of us in California following this issue remain concerned about the propriety of the Department of Defense embarking on its own studies outside the eye of the public, especially when so much is at stake.

We are requesting that the EPA convene a publicly transparent process to review the test protocols and studies which the DOD is undertaking. We request that scientists from the public interest community be involved in whatever process that EPA initiates. We would be happy to provide you with a list of qualified scientists skilled in identifying the hazards of exposure to endocrine disrupting chemicals.

As you know, I will be out of my office for the next two weeks, but you can leave me a message, or page me (888-709-4949) if you require any further information. Thank you for your kind attention to this matter.

Sincerely,

Jane Melanie Williams

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c:/perchlorate:shapiro

KEVIN

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Studies, Cost and Time Frame

STUDY	Description	4Q97	1Q98	2Q98	3Q98	4Q98	~Cost (thosands)	Sponsor
1. Neurobehavioral Developmental	tests nervous system of fetal, newborn and young animals	X	X	X			350	USAF
2. 90-day, all other organs	tests many organs of young adult animals	X	X	X			350	USAF
3. Receptor kinetics (in vitro studies; perchlorate discharge tests)	tests for mechanism of toxicity	X	X				in house literature review	USAF
4. Segment II developmental	tests for birth defects		X	X			101*	PSG
5. ADME - Absorption, Distribution, Metabolism and Elimination a. Literature Review b. Kinetics Proposals c. Throid Mechanistic Study (3 phases)	compares how perc lorate is absorbed, metaboli ed, and excreted in animals and humans	X	X	X X X	 X X	 X	 Internal 200 (USAF) 150+ (RTP)	 USAF/PSG NASA NASA
6. Mutagenicity/ Genotoxicity	tests for mutations and toxic effects on DNA		X	X			37	PSG
7. Reproductive	tests for reproductive performance in adults, and for toxicity in young animals		X	X	X	X	334*	PSG
8. Immunotoxicity	tests for immunotoxicity in adults			X	X	X	275	US Army

* Does not include the analysis of thyroid hormones. If needed, this work is estimated to cost between 55 and 85 thousand dollars.

May 1997

Studies and Areas of Scientific Uncertainty In Reference Doses

STUDY	Description	H	A	S	D	L	Study's Usefulness
1. Neurobehavioral Developmental	tests nervous system of fetal, newborn and young animals	X			X		tests whether young animals are more sensitive than adults; may reduce H and may reduce D factor
2. 90-day, all other organs	tests many organs of young adult animals				X		Minimum database for RfD derivation; may reduce D factor
3. Receptor kinetics (in vitro studies; perchlorate discharge tests)	tests for mechanism of toxicity	X	X				shows if uncertainty factors for H and A can be changed from default values of 10
4. Segment II developmental	tests for birth defects				X		will reduce D factor
5. ADME - Absorption, Distribution, Metabolism and Elimination	compares how perchlorate is absorbed, metabolized, and excreted in animals and humans	X	X		X		Helps to evaluate if uncertainty factors for H and A can be changed from default values of 10; may affect value of D factor
6. Mutagenicity/ Genotoxicity	tests for mutations and toxic effects on DNA			X	X		may affect value of S and D factor
7. Reproductive	tests for reproductive performance in adults, and for toxicity in young animals				X		will reduce D factor
8. Immunotoxicity	tests for immunotoxicity in adults				X		may reduce value of D factor

Uncertainty factors for developing RfDs are as follows:

H = average human to sensitive human
A = animal to human
S = short term to long term studies
L = LOAEL to NOAEL
D = data base deficiencies